IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

In re:	§	Chapter 11
KRISJENN RANCH, LLC	§	
Debtor	§ §	Case No. 20-50805
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE	§	
ROW as successors in interest to	§	
BLACKDUCK PROPERTIES, LLC,	§	
Plaintiffs	§	
••	§	
v.	§	
	\$ \$ \$	
DMA PROPERTIES, INC., and	§	
LONGBRANCH ENERGY, LP,	§	Adversary No. 20-05027
Defendants	§	·
DMA PROPERTIES, INC	§	
Cross-Plaintiff/Third Party Plaintiff	§	
v.	§	
KRISJENN RANCH, LLC,	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE ROW,	§	Adversary No. 20-05027
BLACK DUCK PROPERTIES, LLC,	§	-
LARRY WRIGHT, and JOHN TERRILL	§	
Cross-Defendants/Third-Party	§	
Defendants		

KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST TO BLACK DUCK PROPERTIES, LLC'S MOTION TO ENTER ORDER ON DEBTORS' MOTION TO COMPEL (DKT. 190)

TO THE HONORABLE CHIEF BANKRUPCY JUDGE RONALD B. KING:

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively

the "Debtors"), and file this Motion to enter their proposed order on their Motion to Compel

Discovery Responses from DMA Properties, Inc. ("DMA"), Frank Daniel Moore ("Moore"), and

Longbranch Energy, LP ("Longbranch") (the "Motion"), and would respectfully show as follows:

1. On December 22, 2020, the Court held an expedited hearing on the Motion.

2. Upon granting relief, the Court Ordered Debtors to file a proposed order.

3. Debtors have sought to confer with counsel for DMA, Moore, and Longbranch

about the proposed order. However, upon such conference the parties were unable to agree about

the substance of the Court's order, including but not limited to whether it was stipulated that

George Pigg did not represent Black Duck in drafting the Longbranch Assignment, whether Moore

was to be presented for his redeposition on January 5 or 6, 2021, or whether Moore was required

to make his phone and text messages available at the time of his deposition.

4. Debtors now file their proposed order as Exhibit A to this motion.

WHEREFORE PREMISES CONSIDERED Debtors pray that this Court enter the order

attached hereto as Exhibit A, and for such further relief as the Court may deemed them justly

entitled.

Dated: January 5, 2020.

Signature on following page.

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller

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ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 5th day of January 2020:

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